

**CONSULTATION REPORT**

**Responses from formal consultation on the proposal to establish a Primary Inclusion and Assessment Centre (PIAC) for primary aged pupils with Social, Emotional and Behavioural difficulties at Coedffranc Primary School, Stanley Road, Skewen, Neath SA10 6LP**

**Introduction**

The Council has consulted with interested parties on its proposal to establish a Primary Inclusion and Assessment Centre (PIAC) for primary aged pupils with Social Emotional and Behavioural difficulties at Coedffranc Primary School. If implemented, this proposal will take effect on 15<sup>th</sup> January 2018.

The consultation period ran from 6<sup>th</sup> September 2017 to 20<sup>th</sup> October 2017. A list of consultees is included at Appendix 4. The consultation document was e-mailed to all consultees and was also available on the Council's website.

**Legislative Process**

The consultation document invited views and opinions to be submitted in respect of the proposal. Under the Welsh Government Statutory Code for School Organisation the Council is required to publish a consultation report summarising any issues raised by consultees, the Council's response to those issues and Estyn's view of the overall merit of the proposal.

If approved, the next stage of the process is to publish a statutory notice outlining the proposal. This would need to be published for a period of 28 days and formal written objections would be invited during this time.

If objections are received, an objection report will be published summarising the objections and the Council's response to those objections. The Council's Cabinet will need to consider the proposal in light of objections received when making its decision on whether the proposal is to be implemented.

**Consultation meetings**

During the consultation period, the following consultation meetings were held:

School Staff:	19 <sup>th</sup> September 2017, 3.30pm at Coedffranc Primary School
Governors:	19 <sup>th</sup> September 2017, 4.30pm at Coedffranc Primary School
Pupils:	19 <sup>th</sup> October 2017, 10.00am at Coedffranc Primary School

## **Consultation Responses**

Two written responses, one from ESTYN and the other from an individual respondent, were received on or before the closing date for returns for the formal consultation on this proposal. Written responses were also received from pupils during their consultation meeting.

Responses received were in favour of the proposal with queries relating to funding, staffing and training.

Consultation notes from the consultation meetings, including officer responses, are attached as appendices to this document.

### **Estyn response to the proposal:**

The proposal is to establish a Primary Inclusion and Assessment Centre (PIAC) for up to 12 pupils at Coedffranc Primary School and a Learning Resource Centre (LRC) for up to 12 pupils at Crynallt Primary School for pupils with a statement of SEN. All places will be for those pupils identified as having social, emotional and behavioural difficulties (SEBD) and is likely to improve the standard of educational provision for those pupils with SEBD.

### **Description and benefits**

Neath Port Talbot County Borough Council has presented a clear rationale for the proposals to site a PIAC at Coedffranc Primary School and LRC at Crynallt Primary School. The authority has considered provision for pupils who require specialist support for their educational needs and taken appropriate account of educational standards, school places and accessibility, the quality and sustainability of school accommodation and, effective financial management.

The proposals for both specialist centres establish that there has been an increase in demand for primary school places for pupils with ASD and SEBD, including for early years pupils.

The proposals set out clearly that there is a need to extend existing provision and establish, in the primary sector, a similar approach to that already in place in the secondary sector.

The authority has considered a useful set of criteria to guide the location of the proposed specialist provision in Crynallt Primary School and Coedffranc Primary School.

The proposals have considered the impact of the new provision on pupils with SEBD and their parents and concludes that this is not a risk. However, it has not considered any impact on existing pupils at the schools.

The plan has considered appropriately the impact on transport arrangements including the increase of vehicles on the school site. The council proposes that they will address this issue through a consultation on arrangements for traffic management and subject to planning arrangements on the school site. With the exception of the increase of vehicles on site, this proposal will have no impact on current travel arrangements for existing pupils or new pupils with SEBD who will be accessing the specialist provision.

The Equality Impact Assessment indicates that there will be no adverse effect on any particular group of pupils and proposes that the development will promote inclusivity and the needs of different groups.

The proposal will not negatively affect the provision for Welsh for pupils who will access the specialist provision. The proposal takes suitable account of the WESP and confirms that the council is satisfied that provision for those pupils who speak Welsh as a first language will be sufficient. Proposals for the provision at both schools will be at least comparable with existing provision.

The proposal is likely to have no adverse impact on community usage at either Crynallt Primary School or Coedffranc Primary School. The provision at both schools will occupy accommodation surplus to requirements within self-contained units.

The legal aspects of the proposal have been considered and operate within the School Standards and Organisation (Wales) Act 2013. The plan confirms that proposed procedures are in line with legislative requirements.

As part of a wider strategy to improve provision and experiences for pupils with SEBD, the council has considered a series of options for this provision. The preferred options to site the provision at Crynallt Primary (LSC) and Coedffranc Primary (PIAC) best fits the school assessment criteria for specialist accommodation. The proposals note that;

*“Coedffranc has been identified a suitable location for the provision of a PIAC for a number of clearly identified reasons including the experience and expertise that can be provided by its staff, the nurturing and supportive ethos within the school and the effective links developed with a wide range of partners.”*

*“Crynallt Primary has been identified a suitable location for the provision of an LSC for a number of clearly identified reasons including the experience and expertise that can be provided by its staff, the nurturing and supportive ethos within the school and the good record the school has at partnership working with a range of agencies.”*

## **Educational aspects of the proposal**

The proposal has considered appropriately outcomes, provision and leadership at Crynallt Primary School and Coedffranc Primary School. It has drawn on a suitable range of evidence to do this.

The proposal recognises that, since the Estyn inspection of Coedffranc Primary School in 2014 when outcomes and prospects for improvement were both judged adequate, the school has improved. The ERW Core Visit Report of 2016 comments that improvement actions are still to have an impact on standards.

Notably, this report comments on a period of instability due to changes in senior leadership (head and deputy). The proposal does not make clear whether the current leadership position has resulted in greater stability. It does state, though, that the school is an improving school and has a suitable nurturing and supportive environment. The school is categorised as Amber in the National School Categorisation System. However, the proposals state that end of stage data 2017 indicates that outcomes are improving, particularly at the end of key Stage 2.

Crynallt Primary School was judged by Estyn (2015) as good for both current performance and prospects for improvement. The school has been consistently categorised as green or yellow. The proposal notes that this is a highly effective school that has secured a good level of learner outcomes in key indicators and that leadership is purposeful and effective. The school already has a well-established nurture group to support pupils with SEBD.

The proposal suggests that the new provision is not likely to impact negatively on the ability of the school to deliver the full curriculum at all key stages and maintain current standards.

## **NPTCBC response to Estyn’s comment:**

There should be a positive impact on pupils in Coedffranc Primary currently as the introduction of the PIAC will ensure that mainstream staff will have access to specialist advice to manage and support all pupils. Additionally, pupils attending Coedffranc Primary Schools have been consulted on the proposal and are enthusiastic about the PIAC being established at their school.

**Meeting with staff of Coedffranc Primary School  
on 19th September 2017**

Meeting was attended by Local Authority officers and staff from Coedffranc Primary School.

**Questions raised:**

- If successful what are the timescales for this proposal?
- How are pupils placed in the provision?
- What is the difference between this provision and the Pupil Inclusion Centre (PIC) in Awel y Mor?
- This school has worked hard to improve parental perception and relationships between home and school – will this proposal undermine what has been done, will it cause parents to remove pupils and result in pupil numbers dropping?
- Will this create extra work for the school ALNCo and so negatively impact on the mainstream ALN pupils?
- How will pupil integration work?
- Can Coedffranc Primary pupils access the provision?
- How long will pupils remain in the provision?
- What extra staff will be required? What about staff cover?

**NPTCBC's Response:**

- It is anticipated that a decision will be made on whether the proposal is approved on January 11<sup>th</sup> 2018, with the proposed implementation date to be January 15<sup>th</sup> 2018. However it is not expected that the provision will open its doors to pupils on that date as there will need to be thorough planning and preparation undertaken before pupils start. It is likely that the provision will be open to pupils by the start of the summer term; however this is dependent on being able to appoint appropriate staff and on the refurbishment works being completed.
- Pupils will be placed at this provision via a special admission panel of the Council and specific entry and exit criteria will apply. The school will have representation on that panel and the needs of each individual pupil will be fully discussed before a place is allocated.
- This provision is planned as an additional resource within the primary continuum of support for pupils with SEBD. It is expected that pupils placed here will complement current provisions, and that it will provide the opportunity for more in depth assessment and therapeutic support as well as identifying whether the pupil can return to a mainstream setting or will require a more long term provision.

It is anticipated that in general the pupils accessing support at the PIAC are more likely to return to mainstream and may not require such intensive support.

- The aim of this proposal is to enhance provision at Coedffranc and it is to be hoped that parents will recognise that this proposal seeks to support the school in further developing its work in improving pupil wellbeing across the school. Where similar provisions have been established elsewhere in Neath Port Talbot pupil numbers have remained stable and fears over negative impacts on mainstream pupils have not materialised. In many schools the establishment of an SEN provision has in fact had a positive effect on the school.

- This proposal is not intended to create extra work and bureaucracy for the mainstream ALNco or to detract from the support being provided for mainstream SEN pupils. It is expected that the staff appointed to manage the assessment centre will be sufficiently skilled to undertake the necessary paperwork involved without needing to rely on the mainstream staff. However it would be good practice to ensure that there is good communication between mainstream and the provision and that expertise as well as workload can be shared. This should then result in a positive impact on all pupils.

- Integration will take place at the discretion of the school. Where it is felt to be beneficial for the PIAC pupil and the mainstream pupils then it should be facilitated, where it would be detrimental for either or both then it should be avoided. Transition work for a pupil returning to his/her mainstream school will be planned thoroughly with the returning school and should not negatively impact on Coedffranc Primary mainstream pupils.

- Coedffranc Primary pupils will be able to formally access the provision in the same way as pupils in other schools via the admission panel, but it is also possible that pupils can informally access some of the PIAC facilities on occasions, depending on how the provision is organised and managed by the school.

- The proposed PIAC is intended to provide support for children who will either return to their mainstream school, or who will require a longer term placement at a support centre elsewhere within Neath Port Talbot. As such it is not expected that pupils will remain in the PIAC for longer than 3 terms. These children will not be on roll at Coedffranc Primary and will continue to be registered at their base school during their time at the PIAC.

- The proposed provision will be fully funded to ensure that staffing requirements are met to adequately support the pupils who will be placed there. It is planned that these staff would be additional to the staff of the mainstream school although there is nothing to suggest that staff currently at the school would not be able to apply for positions in the centre if they wished to do so. In the event of PIAC staff absence the school would be expected to manage this in the same way as they manage staff absence in mainstream, to best suit the needs of the school as a whole.

**Meeting with Governors of Coedffranc Primary School**  
**on 19th September 2017**

Meeting was attended by Local Authority officers and members of the Governing Body of Coedffranc Primary School.

**Questions raised:**

- Will costs other than those identified for teaching and support staff in the proposed PIAC be considered when arranging funding for this proposal, for example extra work for admin staff may result in additional cost to the school?
- Will placing the provision here affect the overall school capacity?
- If the proposal is approved will the local authority be able to alter the numbers of pupils attending the provision or the levels of funding the school will receive? If the unit is not full will the LA claw back funding?
- Who is responsible for the attendance of the pupils at the provision?
- If successful what are the timescales for this proposal and what will be the process for appointing staff?
- How will sickness/absence of staff in the PIAC be covered?
- What will be the arrangements for on-going training for the PIAC staff? What about mainstream staff – will they be able to access any specialist training also?
- Is additional training available for Governors?

**NPTCBC's Response:**

- The proposed provision will be fully funded to ensure that staffing requirements are met to adequately support the pupils who will be placed there. This proposal is not intended to increase costs or create extra bureaucracy for the mainstream staff and it is unlikely that there would be a significant increase in administration work as a result of this proposal.
- The overall capacity of the school will decrease as a result of the PIAC being placed in Coedffranc Primary.
- The Local Authority would not be able to increase the number of pupils placed at the provision by more than 10% without further consultation. The agreed level of funding will remain unchanged regardless of whether the provision is full or not and there will be no claw back if the planned numbers of places are not filled.
- The day to day responsibility for attendance will lie with Coedffranc Primary and it is expected that the school will ensure that everything is done to make sure the PIAC pupils attend every day. However overall responsibility lies with the

base school where the pupil is on roll and the attendance data for the pupil will not impact on Coedffranc Primary,

- It is anticipated that a decision will be made on whether the proposal is approved on January 11<sup>th</sup> 2018, with the proposed implementation date to be January 15<sup>th</sup> 2018. However it is not expected that the provision will open its doors to pupils on that date as there will need to be thorough planning and preparation undertaken before pupils start. It is likely that the provision will be open to pupils by the start of the summer term; however this is dependent on being able to appoint appropriate staff and on the refurbishment works being completed. The Governing Body will make the staff appointments but Local Authority support would be available to ensure the highest calibre of staff are appointed with the most appropriate skills.
- In the event of PIAC staff absence the school would be expected to manage this in the same way as they manage staff absence in mainstream, to best suit the needs of the school as a whole.
- The staff employed to work in the PIAC will be employed by Coedffranc Primary and so will have the same access to on-going training and professional development as other staff within the school.
- There are likely to be many opportunities for main stream staff to access any specialist training available for PIAC staff, and it would be considered to be good practice to ensure that expertise is effectively shared across the school.
- The Local Authority will ensure training will be made available for the Governors

**Notes of a meeting with pupils from Coedffranc Primary School**  
**(19th October 2017)**

Pupils were wholly supportive of the proposal and were keen to point out that Coedffranc Primary is a 'Rights Respecting School' where all children are made to feel welcome and are supported by staff to manage their behaviour and learn self-control. They felt they would be able to welcome pupils from other schools and help them integrate successfully into their classes or activities ready for when they need to return to their own schools.

**Issues Discussed:**

- Where will the pupils be based within the school?

Work will take place to adapt spare classrooms at the school so that they will be suitable for the PIAC pupils.

- Where will they come from and how will they get here?

The pupils who attend the PIAC could come from anywhere in Neath Port Talbot and some may need to come by taxi or minibus. This will need to be managed by the school and Governors, and will be discussed fully if the proposal is approved.

- Will the children who come here be with other children who they don't get on with because that could be bad for them?

The pupils who attend the PIAC will be chosen by a special panel of the Council and they will take great care to make sure they have the right mix of pupils attending; any difficulties between pupils will be noted and dealt with very quickly

- How long will they stay?

It is not planned that the pupils will stay for ever at the PIAC – they will only stay for a few terms and then move on, either back to their original school or to another school or specialist unit elsewhere.

- I think it is a good idea, the only problem could be that year 3 and 4 might not be ok with it.

The rooms that have been discussed as being suitable for the PIAC should the proposal be approved are situated in the end of the school where year 3 and 4 have traditionally been based, so those year groups may feel concerned that they

might have to move to another part of the building. This is a good point and will need to be discussed with the teachers and Governors of the school in more detail.

Pupils also submitted written responses all of which were supportive of the proposal. Comments received include –

- I think it is a good idea because we can help people who need it so they can become better and so they can calm down
- I think it is a very good idea because our school supports all children with disabilities or anger problems. I think this should happen
- I think it's a good idea because we can help people with problems, and I think it's good that it's small groups and lots of staff to help, and with a calming down room
- I think it's a good idea because it does not affect anyone (already at the school).
- I think it is a good idea because it will help children from Coedffranc to work with other people.
- I think this is a great idea because some pupils need special support and they will be able to be in their comfort zone while learning and it can be easier for them to learn and be comfortable when there are less children and special teachers who can deal with their behaviour and they can work at their own pace without any stress.
- I think it's a good idea for people who have special needs and problems. I think if loads of people have come from different schools they haven't had the right calming signs and things like that.

**List of Consultees:**

Coedffranc Primary School

Pupils  
Parents/Carers/Guardians  
Prospective nursery/secondary transfer  
School Staff  
Governing Body  
Wider School Community

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All other NPT schools

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Bordering Authority - Swansea / Bridgend / Carmarthenshire / Powys / RCT

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Diocese - Diocese of Menevia, Swansea  
CIW - Diocesan of Llandaff, Vale of Glamorgan

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Trade Unions - Regional Organisers for: 3 x Non-teaching & 6 x Teaching

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NAASH (Secondary Schools Forum)  
LLAN (Primary Schools Forum)

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MP (for Aberafan) – Stephen Kinnock  
MP (for Neath) – Christina Rees

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AM (for Aberafan) – David Rees  
AM (for Neath) - Jeremy Miles

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Regional AMs (South Wales West) -  
Suzy Davies/Bethan Jenkins/Caroline Jones/Dai Lloyd

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NPT Elected Members

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Coedffranc Community Council

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WG Schools Management Division

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Estyn

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Regional Education Consortium (ERW)

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NPTC Group

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NPTCBC Integrated Transport Unit

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Police & Crime Commissioner

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Children & Young Person Partnership  
(including Early Years Development and Childcare)

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Flying Start and Early Years providers

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Communities First Partnership

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*NPTCBC as the maintaining authority -*  
NPT Senior Management (Education)  
NPT Admissions Officer  
NPT ERW Officer  
NPT Education Psychologists  
NPT ALNST  
NPT Governor Support  
NPT Human Resources  
NPT Legal Services  
NPT Planning  
NPT Property Management  
NPT Gypsy/Traveller Officer (Education)

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Rh/rvg:19.12.16